

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	Criminal Case No. 1:09-CR-430
v.	)	
	)	
YESENIA BANEGAS,	)	Honorable Anthony J. Trenga
OSCAR BARAHONA,	)	
FIDELINO FERRUFINO	)	
SANTOS EUCEDA MANZANARES,	)	
DELMY MENDIETA,	)	
WILMER MENDIETA,	)	
MARIA DEL CARMEN RAPALO,	)	
JOSE RODRIGUEZ,	)	
JOSE VILLATOROS,	)	
	)	
Defendants.	)	

**GOVERNMENT’S MOTION TO JOIN DEFENDANT RODRIGUEZ’S MOTION FOR  
LEAVE TO KEEP WITNESSES ON CALL**

The United States of America, by and through its undersigned counsel, moves to join Defendant Jose Rodriguez’s Motion For Leave To Keep Witnesses On Call (“Defendant’s Motion”). For the reasons explained in Defendant’s Motion as well as the expectation that the government will need to call over 30 witnesses in the its case-in-chief, the United States respectfully joins Defendant Rodriguez’s request that the Court permit witnesses under subpoena to remain on call for trial in lieu of appearance on the first day of trial. The request will assist scheduling the appearances of non-local witnesses and an orderly presentation of trial testimony.

Respectfully submitted,

Neil H. MacBride  
United States Attorney

By:                     /s/                      
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CERTIFICATE OF SERVICE

I hereby certify that on the 9<sup>th</sup> day of July 2010, I electronically filed the foregoing Opposition with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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\_\_\_\_\_/s/

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